

1 STEVEN KALAR
2 Federal Public Defender
2 RITA BOSWORTH
3 Assistant Federal Public Defender
3 19th Floor Federal Building
4 450 Golden Gate Avenue
4 San Francisco, CA 94102
Telephone: (415) 436-7700

Counsel for Defendant ROBERTS

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA

10 UNITED STATES OF AMERICA,) No. CR 13-760 CRB (MEJ)
11)
12 Plaintiff,) STIPULATION AND [PROPOSED]
13 v.) ORDER TO MODIFY CONDITIONS OF
14) RELEASE
15 CASSIE ROBERTS,)
16 Defendant.)

On December 11, 2013, Cassie Roberts was released on a \$150,000 unsecured bond to reside with a third-party custodian at her home in Richmond. Three viable sureties signed onto the bond. As a condition of release, Ms. Roberts was placed on electronic monitoring. She is permitted to leave her residence for court appearances, legal visits, medical and treatment appointments, and for employment purposes as approved by pretrial services. Ms. Roberts has been in compliance with all her conditions of release. She now requests that the Court modify her conditions of release to permit her to leave her residence for a period of up to six hours in order to shop for Christmas gifts for her family and children. She would not be permitted to enter the Tenderloin, and she would be required to inform the pretrial services officer where she intends to shop. She further requests that pretrial services be given the discretion to permit her to

1 leave her residence for child care purposes. Pretrial services officer Silvio Lugo does not oppose
2 this modification. The government also does not oppose this modification.

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4 IT IS SO STIPULATED.

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6 MELINDA HAAG
United States Attorney

7 12/19/13

/s/

8 DATED

9 KATIE MEDEARIS
Assistant United States Attorney

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STEVEN KALAR
Federal Public Defender

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12/19/13

/s/

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DATED

14 RITA BOSWORTH
Assistant Federal Public Defender

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16 In light of the parties' stipulation, it is hereby ORDERED that the defendant's conditions
17 of release shall be modified such that the defendant shall be permitted to leave her residence to
18 shop for Christmas gifts. She shall not enter the Tenderloin and pretrial services shall approve
19 the location and timing of her shopping. The Court further modifies the bond to give pretrial
20 services the discretion to allow the defendant to leave her residence for child care purposes. All
21 other conditions of release remain in place.

Defendant shall only be allowed to
shop for her Christmas gifts for no
more than 6 hours.

22

December 23, 2013

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DATED

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STIP. & [PROPOSED] ORDER TO MODIFY
CONDITIONS OF RELEASE
US v. Roberts, 13-760 CRB (MEJ)

MARIA ELENA JAMES
United States Magistrate Judge

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